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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SANDRA DE BLANC,

Plaintiff,

vs.

ALOHA AIRPORT EXPRESS, a Foreign Limited Liability Company; DOES 1 through 20; ROE BUSINESS ENTITIES 1 through 20, inclusive jointly and severally,

Defendants.

CASE NO.: 2:18-cv-00151-APG-CWH

**STIPULATION AND ORDER FOR EXTENSION OF TIME TO COMPLETE DISCOVERY (SECOND REQUEST)**

Plaintiff, SANDRA DE BLANC, and Defendant, ALOHA AIRPORT EXPRESS, by and through their respective counsel, and pursuant to Local Rule 26-4, stipulate to modify their discovery plan as follows:

1. Plaintiff filed her Complaint in the Eighth Judicial District Court for Clark County, Nevada on October 20, 2017. Defendant removed the action to this Court on January 26, 2018 (ECF No. 1).

2. The parties held their F.R.C.P. 26 conference on March 5, 2018 and filed their initial Stipulated Discovery Plan and Scheduling Order in compliance with F.R.C.P. 26(f) and LR 26-1(e) on March 7, 2018 (ECF No. 16). The parties filed a Stipulation and Order for Extension of Time to Complete Discovery (First Request) on April 27, 2018. In the first

1 Stipulation for the extension of the discovery deadlines, the parties agreed to the following  
2 dates:

3 Last day to Amend Pleadings/Add Parties: June 25, 2018  
4 Initial Expert Disclosure: July 24, 2018  
5 Joint Interim Status Report: July 24, 2018  
6 Rebuttal Expert Disclosure: August 24, 2018  
7 Discovery Cut Off: September 24, 2018  
8 Dispositive Motions: October 23, 2018  
9 Joint Pre-Trial order: November 23, 2018

10  
11 The Stipulation and Order for Extension of Time to Complete Discovery (First Request)  
12 was signed by United States Magistrate Judge Carl W. Hoffman on May 1, 2018 (ECF No. 21).

13 3. In compliance with Local Rule 26-4, the parties provide the following  
14 information regarding the discovery status:

15 a. Discovery Completed: The parties have exchanged initial disclosures of  
16 witnesses and documents, have served written discovery, Plaintiff's deposition has been taken  
17 and the parties have exchanged initial expert disclosures.

18 b. Discovery that remains to be completed: Additional time is needed for  
19 Defendant to schedule and conduct the depositions of Plaintiff's expert witnesses  
20 William Muir, M.D. and Lane Swainston and Plaintiff to schedule and conduct the depositions  
21 of Defendant's driver Daniel Leivas and Defendant's FRCP 30(b)(6) witness Michael Logan,  
22 both of whose depositions must be taken out-of-state in Arizona. No further discovery is  
23 anticipated at this time; however, additional discovery may be required based upon the  
24 deposition testimony of those witnesses. The parties have been diligently working with each  
25 other and co-operating with discovery requests as necessary. Based on the foregoing, the  
26 parties are requesting additional time to complete the discovery set forth above.

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1                   c.     Reasons why discovery was not completed: There is good cause for a  
2 sixty (60) day extension of the discovery cutoff deadline. Counsel have been working diligently  
3 to attempt to adhere to the current discovery time lines. However, due to the congested  
4 schedules of counsel, including trial obligations, the parties require additional time to conclude  
5 the limited discovery set forth above. Thus, the request for additional time is being requested.  
6 The instant request is not made for purposes of delay. The parties are working diligently to  
7 complete all remaining discovery.

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9                   d.     Proposed schedule for completion of remaining discovery (extension of  
10 remaining deadlines by sixty 60 days):

11	<b>Last day to Amend Pleadings/Add Parties:</b>	<b>CLOSED</b>
12	<b>Initial Expert Disclosure:</b>	<b>CLOSED</b>
13	<b>Joint Interim Status Report:</b>	<b>CLOSED</b>
14	<b>Rebuttal Expert Disclosure:</b>	<b>CLOSED</b>
15	<b>Discovery Cut Off:</b>	<b>November 23, 2018</b>
16	<b>Dispositive Motions:</b>	<b>December 21, 2018</b>
17	<b>Joint Pre-Trial order:</b>	<b>January 22, 2019</b>

18                   SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

19                   DATED this 22<sup>nd</sup> day of August, 2018.

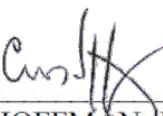
20                   RICHARD HARRIS LAW FIRM

22                   By: /s/ Ian C. Estrada

23                   IAN C. ESTRADA, ESQ.  
24                   Nevada Bar No. 12575  
25                   801 South Fourth Street  
26                   Las Vegas, Nevada 89101  
27                   Attorneys for Plaintiff

27                   IT IS SO ORDERED.

28                   DATED: August 24, 2018

  
C.W. HOFFMAN, JR.  
UNITED STATES MAGISTRATE JUDGE

19                   DATED this 22<sup>nd</sup> day of August, 2018.

20                   WILSON ELSER MOSKOWITZ EDELMAN &  
21                   DICKER, LLP

22                   By: /s/ Christopher D. Phipps

23                   MICHAEL LOWRY, ESQ.  
24                   Nevada Bar No. 10666  
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                    Attorneys for Defendant  
                    ALOHA AIRPORT EXPRESS, LLC

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2 IT IS SO ORDERED:  
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UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_

